

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

REGINA ANKRAH, as, co-executor of the  
Estate of Angelina Iwusu-Afriyie,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

**Civil Action No. 04-40249-FDS**

**JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE EXPERT DISCOVERY  
FOR PURPOSES OF SETTLEMENT NEGOTIATIONS**

The Parties to this action, through counsel, respectfully request an extension of time of 24 days until January 31, 2007, to complete expert discovery for the purpose of engaging in settlement negotiations. The United States is in the process of preparing a settlement counter-proposal in response to a proposal recently offered by the plaintiffs. The extension of time will allow the parties to focus on settlement and avoid the additional costs of expert discovery in the event a settlement can be reached. The parties also request that pre-trial proceedings also be extended past the current date of February 12, 2007.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose.

Respectfully submitted,

For the Plaintiff,

REGINA ANKRAH, ET AL.,

For the Defendant,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN  
United States Attorney

<u>/s/ David W. Suchecki 12/14/2006 (By: APG)</u> Elizabeth Mulvey David W. Suchecki CROWE AND MULVEY, L.L.P. 141 Tremont Street Boston, MA 0211 617-426-4488 (Voice) 617-426-5511 (Fax) <a href="mailto:dsuchecki@croweandmulvey.com">dsuchecki@croweandmulvey.com</a>	By: <u>/s/ Anton P. Giedt 12/14/2006</u> Anton P. Giedt Assistant U.S. Attorney 1 Courthouse Way Boston, MA 02210 617-748-3309 (Voice) 617-748-3967 (Fax) <a href="mailto:anton.giedt@usdoj.gov">anton.giedt@usdoj.gov</a>
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**CERTIFICATE OF SERVICE**

Suffolk, ss.

Boston, Massachusetts  
DATE: December 14, 2006

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon counsel of record in this action through Electronic Filing.

/s/ Anton P. Giedt  
Anton P. Giedt  
Assistant U.S. Attorney